

1 Zabala Farms of Salinas, LLC
2 50 Zabala Road
3 Salinas, Ca 93908

4 818-335-3177
5 DEBTOR

FILED

SEP 20 2022

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

6 UNITED STATES BANKRUPTCY COURT
7 CALIFORNIA NORTHERN BANKRUPTCY COURT

10 Zabala Farms of Salinas, LLC

12 DEBTOR

14 Grupo Flor Leasing II, LLC

15 Monterey County Sheriff Department.

16 RESPONDENT

) Case No. 22-502828 Steven L. Johnson, Judge

) APPLICATION FOR ORDER SHORTENING TIME FOR
) HEARING, re:

) DEBTOR'S MOTION TO VACATE EVICTION AND
) LOCKOUT BY CREDITOR, CONDUCTED WHILE THE
) DEBTOR IS UNDER PROTECTION OF THE COURT.

) FRCP 9006(1)(e)

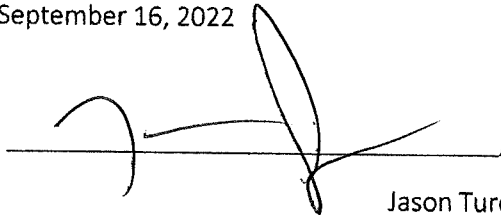
18 NOTICE TO THE COURT AND THE RESPONDENTS AND THEIR ATTORNEYS OF RECORD. COMES NOW, THE
19 DEBTOR Zabala Farms of Salinas, LLC and herein motions this court for its Order shortening time for a
20 hearing - vacating the eviction and lockout by the unsecured creditor, Grupo leasing II, LLC. Upon the
21 substantive grounds that the respondent herein intentionally and with negligence and malice evicted and
22 locked out the Debtor from the agricultural real property, on September 14, 2022.

23 2. The eviction and dis-possession of the lease estate property has and will continue to cause both
24 irreparable harm and injury to the debtor and substantially hamper any and all reorganization efforts
25 and or capacity of the debtor estate.

26 3. This application is made pursuant to FRBP 9006(1)(e)

28 1.

1
2 Dated: September 16, 2022

3
4 

5 Jason Turchin, managing member for Zabala Farms of Salinas,
6 LLC, Debtor
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2.

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF Salinas

3 I am over the age of 18 and not
4 |a party to this action. My address is 1414 Natividad Rd. Salinas, Ca 93906, which is located outside the
5 county where the mailing described took place.

6 On September 17, 2022, I served the foregoing document(s) described: DEBTOR'S MOTION TO
7 VACATE EVICTION AND LOCKOUT BY CREDITOR, CONDUCTED WHILE THE DEBTOR IS UNDER PROTECTION
8 OF THE COURT. DECLARATION OF DEBTOR, ZABALA FARMS OF SALINAS.
MEMORANDUM POINTS AND AUTHORITIES IN SUPPORT THEREOF.
APPLICATION FOR ORDER SHORTENING TIME FOR HEARING

9 Which were served upon:

10 Respondents attorney of record

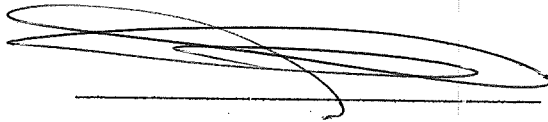
11 Michael Taylor, Esq. County of Monterey
12 1502 N. Broadway 1200 Aguajito Road
13 Santa Ana, Ca 92706 Monterey, Ca 93940

14 x I deposited the foregoing documents in the United States Mail at Monterey, California.
15 Executed on in Monterey, California.

16 (State) XXXX I declare under penalty of perjury under the laws of the State of California that the above
17 is true and correct.

18 (Federal) _____ I declare that I am employed in the office of a member of the bar of this Court at whose
19 direction the service was made.

20 BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the addressee(s)
21 above.



22 Dated: 9/17/2022

23 Mary Smith